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**From:** KLESMITH, DANIELA [DKLESMIT@idem.IN.gov]  
**Sent:** 7/27/2021 3:22:41 PM  
**To:** Mooney, Susan [mooney.susan@epa.gov]  
**CC:** Thill, Stephen D [SThill@idem.IN.gov]; sraman@idem.in.gov  
**Subject:** Vectren-FB Culley Power Plant CCR closure and retrofit of the pond.

Susan:

Couple weeks ago we met with the representatives of Vectren, FB Culley Power Station regarding permitting and construction of new CCR pond. This new pond will serve the facility while the existing East Ash Pond is being closed and until the power plant closes. The proposed location of this new pond is over the area where West Ash Pond was located. IDEM issued approval for the closure of the West Ash Pond back in 2019. The portion of the pond was excavated and ash was consolidated into the smaller footprint. The excavated portion was approved under IDEM "hybrid" closure by removal standard that does not meet all the EPA CCR rule closure by removal requirements. The facility was approved to remove ash and layer of underlying soil and visually confirm that ash has been removed. The facility did not performed any confirmation sampling to demonstrate that all contamination had been removed. IDEM requested and approved soil cover over the excavated areas, groundwater monitoring, dead restriction and 30-year post-closure. During our meeting Vectren appears to indicate that the area can be retrofit under the CCR rule standards, however IDEM stated that the facility would need to meet all the requirements of retrofit including removal of any contaminated soils and sediments. I'm bringing this to your attention, since EPA is in process of reviewing and approving alternative closure demonstrations and IDEM and EPA may differ on interpretation of the retrofit requirements. For IDEM to approve this retrofit, we would request sampling of underlying soils to demonstrate that all the contamination has been removed.

Vectren FB Culley closure approval for West Ash Pond can be found in IDEM virtual cabinet under SW Program ID # 87-UP-14. I'm also including a direct link to this document: [82883920](#).

Hope your are doing well. Looking forward to hear from you.

Thanks



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**COVID-19 Resources:**

- **Indiana State Dept. of Health (ISDH) COVID-19 Call Center:** Call 877-826-0011 (available 8:00 am-5:00 pm daily).
- **Anthem NurseLine:** Call 800-337-4770 or visit the [Anthem NurseLine](#) online for a FREE symptom screening. Available to anyone with an Anthem health plan (this includes State of IN employees)
- **Anthem Employee Assistance Program (EAP):** Available to ALL state employees and adults in household regardless of health plan participation. Call 800-223-7723 or visit [anthemeap.com](http://anthemeap.com) (enter State of Indiana) for crisis counseling, help finding child/elder care, legal/financial consultation and much more.

